

REC'D TN  
REGULATORY AUTH.  
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OFFICE OF THE  
EXECUTIVE SECRETARY



BellSouth Telecommunications, Inc.  
Suite 2101  
333 Commerce Street  
Nashville, Tennessee 37201-3300

615 214-6301  
Fax 615 214-7406

Guy M. Hicks  
General Counsel

August 4, 1999

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Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0500

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AT&T  
1200 Peachtree St., NE  
Atlanta, GA 30309

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426 5th Avenue, N., 2nd Floor  
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Sprint Communications  
3100 Cumberland Circle, N0802  
Atlanta, GA 30339

Charles B. Welch, Esquire  
Farris, Mathews, et al.  
511 Union St., #2400  
Nashville, TN 37219

Val Sanford, Esquire  
Gullett, Sanford, et al.  
230 4<sup>th</sup> Ave., N., 3<sup>rd</sup> Fl.  
P. O. Box 198888  
Nashville, TN 37219-8888

Re: *Proceeding for the Purpose of Addressing Competitive Effects of Contract Service Arrangements Filed by BellSouth Telecommunications, Inc. in Tennessee*  
Docket No. 98-00559

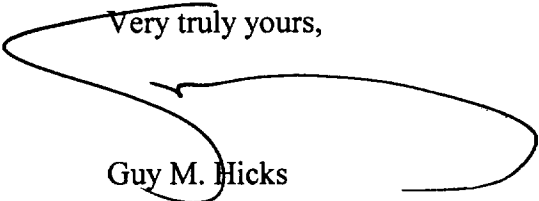
Dear Counsel:

The accompanying Affidavit of Paul J. Grone will be introduced as evidence at the hearing in this proceeding on August 17-18, 1999 in accordance with T.C.A. § 4-5-313. The name of the customer has been redacted. For your information, Mr. Grone represents the "store", as opposed to the "financial institution." Mr. Grone will not be called to testify orally, and you will not be entitled to question such Affiant unless you notify Guy M. Hicks, BellSouth Telecommunications, Inc. at 333 Commerce Street, Suite 2101, Nashville, Tennessee, 37201-

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3300, that you wish to cross-examine such Affiant. To be effective, your request must be mailed or delivered to Guy M. Hicks on or before August 11 (seven days after delivery).

Very truly yours,



Guy M. Hicks

GMH:ch  
Enclosure

cc: David Waddell  
Paul J. Grone

REC'D TN  
REGULATORY AUTH.  
'99 AUG 4 PM 4 15  
BEFORE THE TENNESSEE REGULATORY AUTHORITY  
Nashville, Tennessee  
EXECUTIVE SECRETARY

In re: *Proceeding for the Purpose of Addressing Competitive Effects of  
Contract Service Arrangements Filed by BellSouth  
Telecommunications, Inc. in Tennessee*

Docket No. 98-00559  
Docket No. 99-00210  
Docket No. 99-00244

AFFIDAVIT OF PAUL J. GRONE

1. My name is Paul J. Grone. I am employed by [REDACTED] ("[REDACTED]"). My business address is [REDACTED]. I am the Director of Network Systems for [REDACTED]. In this position, I am responsible for the evaluation and procurement of voice telecommunications services for [REDACTED].
2. I am personally familiar with Contract Service Arrangement CSA KY98-4958-00, which is a Volume & Term Agreement negotiated by BellSouth Telecommunications, Inc. and [REDACTED]. The CSA was signed by [REDACTED] on October 30, 1998 and by BellSouth on November 2, 1998. An amendment to the CSA was signed by [REDACTED] on April 27, 1999 and by BellSouth on April 29, 1999.
3. [REDACTED] is a sophisticated purchaser and user of telecommunications services, and my job involves evaluating the numerous alternatives that exist to meet [REDACTED]'s telecommunications needs. [REDACTED] does business with a number of telecommunications service providers throughout the United States, including competing local exchange providers. For example, NEXTLINK provides local telecommunications services to [REDACTED] at numerous [REDACTED] facilities. [REDACTED] selects its telecommunications providers based on a number of factors, not the least of which are price and quality of service.

4. Many telecommunications service providers, including WorldCom, Time Warner and NEXTLINK, have offered, both prior to and after [REDACTED] negotiated its CSA with BellSouth, to provide local telecommunications services to [REDACTED] in the State of Tennessee. [REDACTED] did not accept these offers and instead agreed to enter into the CSA with BellSouth. At the time [REDACTED] negotiated its CSA with BellSouth, [REDACTED] fully understood that there were alternative local telecommunications service providers able and willing to provide local telecommunications services to [REDACTED] in Tennessee.

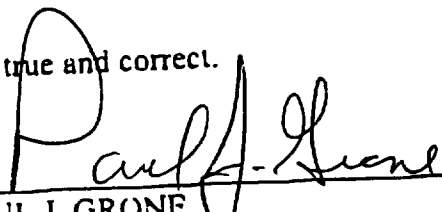
5. [REDACTED] invested substantial time and resources in the development and negotiation of the CSA it entered into with BellSouth. It is in the best interest of [REDACTED] for the CSA to be approved.

6. [REDACTED] understands and agrees to the terms of the CSA. For example, [REDACTED] believes that Section IX, Termination and Liability, of the CSA, is a reasonable provision which should be approved by the Authority.

7. [REDACTED] CSA is in effect in the other eight states in BellSouth's nine state region. Because our CSA has not yet been approved in Tennessee, [REDACTED] has been unable to enjoy the complete benefit of our agreement, specifically the discounts in Tennessee afforded to [REDACTED] under the CSA.

8. [REDACTED] respectfully requests that its CSA be approved as soon as possible so that it may enjoy the full benefit of lower prices in purchasing telecommunications services from BellSouth.

I HEREBY SWEAR that the foregoing is true and correct.

  
PAUL J. GRONE  
Director, Network Systems  
[REDACTED]

Sworn to and subscribed before me, this 2<sup>nd</sup> day of August, 1999.

Brenda R. Andes

Notary Public

My Commission Expires:

BRENDA R. ANDES  
Notary Public, State of Ohio  
My Commission Expires June 20, 2003

CERTIFICATE OF SERVICE

I hereby certify that on August 4, 1999, a copy of the foregoing document was served on the parties of record, via the method indicated:

☒ Hand  
☐ Mail  
☐ Facsimile  
☐ Overnight

Richard Collier, Esquire  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0500

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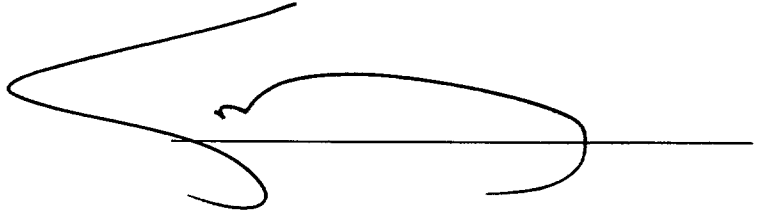
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A handwritten signature in black ink, appearing to be "Val Sanford", is written over a horizontal line. The signature is stylized with a large loop and a trailing flourish.